

Robert S. Banks, Jr., OSB No. 821862
Victoria Blachly, OSB No. 972805
Darlene D. Pasieczny OSB No. 124172
SAMUELS YOELIN KANTOR LLP
Attorneys at Law
111 SW 5th Ave., Suite 3800
Portland, Oregon 97204-3642
Telephone (503) 226-2966
Facsimile (503) 222-2937
bbanks@SamuelsLaw.com

Attorneys for Intervenors

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

SECURITIES AND EXCHANGE COMMISSION, CASE NO. 3:16-cv-00438-PK

Plaintiff,

v.

AEQUITAS MANAGEMENT, LLC; AEQUITAS
HOLDINGS, LLC; AEQUITAS COMMERCIAL
FINANCE, LLC; AEQUITAS CAPITAL
MANAGEMENT, INC.; AEQUITAS
INVESTMENT MANAGEMENT, LLC; ROBERT
J. JESENİK; BRIAN A. OLIVER; and N. SCOTT
GILLIS,

MOTION OF CERTAIN AEQUITAS
INVESTORS TO INTERVENE

Defendants.

CAROLYN HARRIS; JOHN R. STEINBERG;
PAMELA STEINBERG; CELIA S. CASAS;
JIN YANG; HONGHUA YANG; JODY
SAVARA; STANLEY OKAMOTO;
PARTHASARATHY RAGURAM; LEON
BROWN; EDWARD GOODMAN; LENETTA
GOODMAN; MICHAEL ASHMORE;
MARITA ASHMORE; ELISABETH SECAN;
JOHN NEWCOMB; DEBBY NEWCOMB,
MAJID MAJIDIAN; JAMES B. RINGLE;
PHIL H. RINGLE; MARVA C. FABIEN;

Intervenors.

Pursuant to Rule 24(b) of the Federal Rules of Civil Procedure, plaintiffs, who are all investors in various Aequitas investment products, move the court to permissively intervene on grounds that they have claims that will or could be affected by the relief sought by the parties in this case. Specifically, plaintiffs have objections to paragraph 17 C of the Proposed Order Appointing Receiver (Docket #2), which seeks to prohibit parties from enforcing claims against any of a wide variety of properties or entities. Additionally, plaintiffs have an interest in this litigation, as all are victims of the scheme described in the complaint, and wish to have their interests represented.

Dated this 14th day of March, 2016.

SAMUELS YOELIN KANTOR LLP

By: /s/ Robert S. Banks, Jr.
ROBERT S. BANKS, JR., OSB No. 821862
VICTORIA BLACHLY, OSB NO. 972805
DARLENE D. PASIECZNY OSB No. 124172
Telephone: 503-226-2966
Facsimile: 503-222-2937
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